

Louisville Metro Air Pollution Control District
850 Barret Ave., Louisville, Kentucky 40204
December 22 2011

Title V Statement of Basis

Company: Sam Meyers, Inc.

Plant Location: 3400 Bashford Avenue Court, Louisville, KY 40218

Date Application Received: 16 July 2004
16 February 2010

Date of Draft Permit: 11/06/2011

District Engineer: Diana Prentice

Permit No: 91-97-TV(R1)

Plant ID: 989

SIC Code: 7216**NAICS: 81232**

AFS: 00989

Introduction:

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), carbon monoxide (CO), 1 hr and 8 hr ozone (O₃), and particulate matter less than 10 microns (PM₁₀); and is a non-attainment area for particulate matter less than 2.5 microns (PM_{2.5}).

Application Type/Permit Activity:

- ☐ Initial Issuance
☐ Permit Revision
 ☐ Administrative
 ☐ Minor
 ☐ Significant
☒ Permit Renewal
☐ Construction

Compliance Summary:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Compliance certification signed | <input type="checkbox"/> Compliance schedule included |
| <input type="checkbox"/> Source is out of compliance | <input checked="" type="checkbox"/> Source is operating in compliance |

I. Source Information

1. **Product/Process Description:** The source performs dry cleaning using both petroleum solvent and perchloroethylene.
2. **Overall Process Description:** The source receives and dry cleans garments.
3. **Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.
4. **Emission Unit Summary:**

 U2: Dry-to-dry petroleum solvent dry cleaning machine

 U3: Perchloroethylene dry-to-dry cleaning system

 U4: Perchloroethylene dry-to-dry cleaning system
5. **Fugitive Sources:** The equipment vents inside the building.
6. **Permit Revisions:**

Revision No.	Issue Date	Public Notice Date	Type	Attachment No./ Page No.	Description
N/A	01/15/2000	11/21/1999	Initial	Entire Permit	Initial Permit Issuance
R1	12/22/2011	11/06/2011	Renewal	Entire Permit	5 year renewal, incorporating construction permits # 02-06-C, 162-09-C, and removal of Emission Unit U1*

*Note: The source has permanently disabled the equipment previously permitted as Emission Unit U1 per a letter to the District dated November 1, 2011. Therefore, U1 has been removed from the permit.

7. Plantwide Emission Summary:

Pollutant	District Calculated Actual Emissions 2010 Data (tpy)	Major Source Status (based on PTE)
CO	0	No
NO _x	0	No
SO ₂	0	No

Pollutant	District Calculated Actual Emissions 2010 Data (tpy)	Major Source Status (based on PTE)
PM/PM ₁₀	0	No
VOC	0.026	No*
Perchloroethylene	1.485	Yes
Total HAPs	1.485	Yes

*Note: Due to the permanent disabling of equipment permitted in Emission Unit U1 (effective November 1, 2011), the source is no longer potentially major for VOC emissions.

8. Applicable Requirements:

☐ PSD ☒ NSPS ☒ SIP ☒ MACT
☐ NSR ☐ NESHAPS ☒ District-Origin ☐ Other

9. MACT Requirements:

40 CFR 63 Subpart M National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities

10. Referenced Federal Regulations in Permit:

40 CFR 60 Subpart JJJ Standards of Performance for Petroleum Dry Cleaners

40 CFR 63 Subpart M National Perchloroethylene Air Emission Standards for Dry Cleaning Facilities

II. Regulatory Analysis

- Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
- Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source does not manufacture, sell, or distribute any of the listed chemicals. The source's use of listed chemicals is that in fire extinguishers, chillers, air conditioners and other HVAC equipment.
- Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR Part 68, Subpart F, and District Regulation 5.15, *Chemical Accident Prevention Provisions*, in a quantity in excess of the corresponding

specified threshold amount. If the source becomes subject to 40 CFR 68 and Regulation 5.15, the source shall comply with the Risk Management Program and Regulation 5.15 and submit a Risk Management Plan to:

RMP Reporting Center
P.O. Box 3346
Merrifield, VA 22116-3346

4. Basis of Regulation Applicability

a. Plant-wide:

Same Meyers, Inc. is a major source for single HAP, and total HAPs. Regulation 2.16 – *Title V Operating Permits* establishes requirements for major sources.

b. Equipment:

i. Emission Unit U2

Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E6	One (1) DF2000 dry to dry petroleum solvent dry cleaning machine, Make: Union, Model: HL-780. Installed October, 2009.	7.25	Regulation 7.25 applies to each affected facility with VOC emissions and commenced after June 13, 1979.
		40 CFR 60 Subpart JJJ	40 CFR 60 Subpart JJJ applies to petroleum solvent dryers constructed after December 14, 1982.

(1) Standards/Operating Limits

- (a) Regulation 7.25, section 3.1 limits the plantwide VOC emissions to 40 tons per 12-consecutive month period and the source is considered BACT since the machine is dry-to-dry.
- (b) Per Regulation 7.02, section 3.68, the source is subject to 40 CFR 60 Subpart JJJ as this emission point was constructed after December 14, 1982. The source has submitted a letter to the US EPA, dated March 2, 2010, requesting an equivalency determination for this unit. The District has stayed the provisions of 40 CFR 60 Subpart JJJ until the EPA makes a decision on the applicability of the regulation on dry to dry machines.

(2) Monitoring and Record Keeping

- (a) Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.
- (b) The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 60 Subpart JJJ. The source has submitted a letter to the US EPA, dated March 2, 2010, requesting an equivalency determination for this unit. The District has stayed the provisions of 40 CFR 60 Subpart JJJ until the EPA makes a decision on the applicability of the regulation on dry to dry machines.

(3) Reporting

- (a) Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.
- (b) The source is required to comply with applicable reporting requirements of 40 CFR 60 Subpart JJJ. The source has submitted a letter to the US EPA, dated March 2, 2010, requesting an equivalency determination for this unit. The District has stayed the provisions of 40 CFR 60 Subpart JJJ until the EPA makes a decision on the applicability of the regulation on dry to dry machines.

ii. Emission Unit U3

Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E11	One (1) perchloroethylene dry-to-dry cleaning machine, Make: Realstar, Model: M-8039516. Installed July, 2005.	7.25	Regulation 7.25 applies to each affected facility with VOC emissions and commenced after June 13, 1979.
		40 CFR 63 Subpart M	40 CFR 63 Subpart M applies to perchloroethylene dry cleaning systems

(1) Standards/Operating Limits

- (a) **HAP**

Per Regulation 5.02, section 4.12, the source is subject to 40 CFR 63 Subpart M.

(b) **VOC**

Regulation 7.25 requires plantwide VOC emissions be limited to 40 tons per 12-consecutive month period. The District has included emissions from spot cleaner usage in the existing limits of the permit for VOC operations.

(2) **Monitoring and Record Keeping**

(a) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63 Subpart M.

(b) **VOC**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

(3) **Reporting**

(a) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63 Subpart M.

(b) **VOC**

Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

iii. Emission Unit U4

Emission Points			
ID	Description	Applicable Regulation(s)	Basis for Applicability
E10	One (1) perchloroethylene	7.25	Regulation 7.25 applies to each affected facility with VOC emissions and

	dry-to-dry cleaning machine. Make: Union, Model: HL-790. Installed April, 1999.		commenced after June 13, 1979.
		40 CFR 63 Subpart M	40 CFR 63 Subpart M applies to perchloroethylene dry cleaning systems

(1) **Standards/Operating Limits**

(a) **HAP**

Per Regulation 5.02, section 4.12, the source is subject to 40 CFR 63 Subpart M.

(b) **VOC**

Regulation 7.25 requires plantwide VOC emissions be limited to 40 tons per 12-consecutive month period. The District has included emissions from spot cleaner usage in the existing limits of the permit for VOC operations.

(2) **Monitoring and Record Keeping**

(a) **HAP**

The source is required to comply with applicable monitoring and record keeping requirements of 40 CFR 63 Subpart M.

(b) **VOC**

Regulation 2.16, sections 4.1.9.1 and 4.1.9.2 require sufficient monitoring and record keeping assuring ongoing compliance with the terms and conditions of the permit.

(3) **Reporting**

(a) **HAP**

The source is required to comply with applicable reporting requirements of 40 CFR 63 Subpart M.

(b) **VOC**

Regulation 2.16, section 4.1.9.3 requires reporting to assure compliance with the terms and conditions of the permit.

III. Other Requirements

1. **Temporary Sources:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Emissions Trading:** N/A
4. **Operational Flexibility:** The source did not request any operational flexibility for this equipment.
5. **Compliance History:**

Date	Regulation Violated	Settlement
12/11/1996	Reg. 5.02, Section 2, Subpart M emission standard	Agreement
4/22/2010	Reg. 2.03, Section 5, Failure to comply with District permit Reg. 2.16, Section 5, Failure to comply with Title V permit	Agreement

6. Calculation Methodology or Other Approved Method:

The source shall use the VOC content (lb/gal) of each material used multiplied by the amount of material used (gal) to calculate the VOC emissions. The HAP emissions shall also be calculated by multiplying the HAP content (lb/gal) of each material used by the amount of material used (gal).

7. **Insignificant Activities:** The following activities have been determined by the District to be insignificant.

Insignificant Activities		
Description	Quantity	Basis
Natural Gas Boiler (5.85 MM Btu/hr heat input capacity)	1	Regulation 2.02, section 2.1.1

- 1) Insignificant activities identified in District Regulation 2.02 Section 2, may be subject to size or production rate disclosure requirements pursuant to Regulation 2.16 section 3.5.4.1.4.
- 2) Insignificant activities identified in District Regulation 2.02 Section 2 shall comply with generally applicable requirements as required by Regulation

2.16 section 4.1.9.4.

- 3) The District has determined pursuant to Regulation 2.16 section 4.1.9.4 that no monitoring, record keeping, or reporting requirements apply to the insignificant activities listed.
- 4) The Insignificant Activities Table is correct as of the date the permit was proposed for review by U.S. EPA, Region 4.
- 5) The owner or operator shall submit an updated list of insignificant activities that occurred during the preceding year pursuant to Regulation 2.16 section 4.3.5.3.6.
- 6) The owner or operator elected to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions to be reported on the annual emission inventory.